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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **AT SEATTLE**

11 COSTCO WHOLESALE CORPORATION,

12 Plaintiff,

13 v.

14 ARROWOOD INDEMNITY COMPANY,

15 Defendant.

Civil Action No. 2:17-cv-01212-RSL

STIPULATED MOTION AND ORDER TO
CONTINUE DEADLINE FOR DISPOSITIVE
MOTIONS AND EXTEND NOTING DATE

16 Pursuant to LCR 7(d)(1) and LCR 10(g), Plaintiff Costco Wholesale Corporation
17 (“Costco”) and Defendant Arrowood Indemnity Company (“Arrowood”), by and through their
18 attorneys of record, hereby submit this Stipulated Motion and [Proposed] Order to Extend the
19 Filing Deadline for Dispositive Motions by two days to facilitate the Parties’ meet and confer
20 process under LCR 5(g), and Extend the Noting Date for their respective motions by one week.
21 The Parties have met and conferred, and submit this Stipulated Motion in good faith.

22 **DISCUSSION**

23 By its Amended Order Setting Trial Date & Related Dates, the Court set the deadline for
24 the parties to file their respective dispositive motions by November 6, 2018. ECF No. 36. Both
25 Costco and Arrowood had advised one another that they intend to file dispositive motions. This
26 case involves materials that have been designated “confidential” under a Stipulated Protective
27

Order entered into this action on January 11, 2018. ECF No. 16. Upon advising one another of their intent to file dispositive motions, the Parties began a meet and confer process under the protective order and LCR 5(g) with regard to items that may require filing under seal or redaction. In an effort to reach agreement on what materials may need to be filed under seal or be subject to limited redactions, and to withdraw certain items as Confidential before filing the Parties are negotiating the submission of a joint motion to file under seal pursuant to Local Rule 5(g)(2)(B). The Parties therefore respectfully request that the Court briefly extend the deadline for the parties to file the joint motion to file under seal and their respective dispositive motions from November 6, 2018 to **November 8, 2018**.

The Parties have further met and conferred regarding extending the briefing schedule for the dispositive motions by one week given the upcoming holiday schedule. The Parties therefore respectfully request that the Court extend the briefing schedule as follows:

Brief	New Date	Prior Date
Dispositive Motion	11/8/18	11/6/18
Opposition	11/30/18	11/26/18
Reply	12/7/18	11/30/18

STIPULATED TO this 6th day of November, 2018

DATED: November 6, 2018

CLYDE & CO US LLP

/s/ Alexander E. Potente

Alexander E. Potente, WSBA #48858

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Attorneys for Defendant and Counterclaimant

ARROWOOD INDEMNITY COMPANY

1 DATED: November 6, 2018

PACIFICA LAW GROUP LLP

3 /s/ Paul J. Lawrence

4 Paul J. Lawrence, WSBA #13557

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8 Attorneys for Plaintiff

9 COSTCO WHOLESALE CORPORATION

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11 **ORDER**

12 IT IS HEREBY ORDERED that this Stipulated Motion to continue the deadline to
13 **November 8, 2018** for the Parties to submit a joint motion to file under seal and file their
14 respective dispositive motions is GRANTED.

15 IT IS HEREBY FURTHER ORDERED that this Stipulated Motion to extend the briefing
16 schedule for the dispositive motions is GRANTED, with the new briefing schedule for the
17 dispositive motions as follows:

Brief	New Date	Prior Date
Dispositive Motion	11/8/18	11/6/18
Opposition	11/30/18	11/26/18
Reply	12/7/18	11/30/18

23 DATED this 6th day of November, 2018.

24 
25 Honorable Robert S. Lasnik
26 U.S. District Court Judge
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